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# London Fire Brigade, gender, ethnicity and disability Pay Gap report 2022

Report to:

Service Delivery Board  
Commissioner’s Board .....

Date:

14 February 2023  
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London Fire Commissioner .....

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Report by:

[Tiffany Oartan, Strategic Inclusion Manager]

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For information

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# PART ONE

## Non-confidential facts and advice to the decision-maker

### Executive Summary

Under the Equality Act 2012, the London Fire Commissioner ('LFC') is obligated to publish information relating to the gender pay gap of its employees.

There is no statutory obligation to publish ethnicity or disability pay gap information, but this is good practice, particularly in demonstrating how the LFC meets the Public Sector Equality Duty to advance equality of opportunity.

This is the first year we have produced a combined pay gap report for the period commencing 1 April 2021 and ending on 31 March 2022 which provides the following analysis:

- An ethnicity pay gap;
- A disability pay gap; and
- A gender pay gap.

This report should be read alongside our pay gap action plans for Ethnicity, Disability and Gender which is shown in detail at Appendix A. We will continue to monitor progress against the action plans and provide annual updates.

### Recommended decision(s)

#### **For the London Fire Commissioner**

1. That the London Fire Commissioner notes the report

#### **For the Deputy Mayor**

2. That the Deputy Mayor for Fire and Resilience notes the report.

## 1 Introduction and background

1.1 In November 2022, the independent review of Culture released its report. Triggered by the tragic death of Jaden Matthew Francois-Espirit and hearing from over 2,000 members of staff the report highlights discrimination of underrepresented staff who are women, disabled, Lesbian, Gay and Bisexual and those who are from Black, Asian and Ethnic Minority backgrounds. The London Fire Brigade (LFB) has committed to tackling discrimination and inequality at both the institutional level and the individual level. This pay gap report and action plan includes commitments in response to the Culture Review which will further improve our

position on pay equality.

1.2 This is the first year LFB have produced a combined pay gap report for the period commencing 1 April 2021 and ending on 31 March 2022, a summary of findings for each group is presented below.

	Median pay gap (2021)	Median pay gap (2022)	Median pay gap (percentage point change)	Mean pay gap (2021)	Mean pay gap (2022)
<b>Ethnicity</b>					
Ethnically diverse <sup>1</sup>	0.40%	0.83%	0.43%	3.08%	4.52%
Asian or Asian British	-0.95%	0.14%	1.09%	-1.15%	2.19%
Black or Black British	0.00%	0.69%	0.69%	2.32%	3.85%
Mixed / Other Ethnic Group	0.86%	1.06%	0.20%	5.83%	6.28%
<b>Disability</b>	-4.71%	-1.54%	3.17%	-4.93%	-3.03%
<b>Gender</b>	-4.36%	-5.46%	-1.10%	-10.27%	-7.42%

1.3 The ethnicity pay gap analysis is based on a declaration rate of 97.6%. The key findings are as follows:

- As at 31 March 2022, LFB had an overall median ethnicity pay gap of 0.83% and a mean ethnicity pay gap of 4.52%. The mean pay gap has increased since 2021, but the median pay gap whilst very low, has doubled in favour of white staff;
- The mean pay gap has shifted minimally owing to ethnically diverse staff turnover at lower grades and recruitment of ethnically diverse staff at higher grades. However, the median pay gap has not changed much as there has been little change in the composition of the workforce;
- The pay gap is most pronounced amongst Asian or Asian British (+1.09%). This is probably due to lack of representation at higher ranks / grades;
- The median and mean ethnicity pay gap for part time workers is higher than for full time workers;
- Each occupational group has differing ethnicity gap medians for part time workers: Operational staff are +0.79%, the largest pay gap is for FRS at +11.79% and Control is at +5.15%;
- The composition of staff working in the Brigade’s Control function is not representative of London. Just 16 out of 112 Control staff have self-declared as ethnically diverse, of which 12 are Control Room Officer rank (which is the equivalent to a Firefighter). None of the Control staff have self-declared as Asian, neither have any staff above the rank of CRO self-declared as black in this area of the organisation; and,
- After conducting intersectional analysis, it’s clear that our ethnically diverse women employees that have marginally larger positive mean (2.14%) and more significant median (8.19%) pay gaps than overall. This suggests that LFB is more effective at recruiting ethnically diverse women into its senior roles, than men from ethnically diverse backgrounds.

1.4 The disability pay gap and is based on a declaration rate of 97.9%. The key findings are as

<sup>1</sup> Feedback from various groups across the organisation has outlined negative connotations associated with the use of the word BAME (Black, Asian and Minority Ethnic) so this report uses ‘ethnically diverse’ to promote more inclusive language.( Better to explain in body of report than a footnote)

follows:

- As at 31 March 2022, LFB had a median disability pay gap of -1.54% which is an improvement of just over 3% from the previous year and a mean disability pay gap of -3.03% which is a slight improvement from the previous year of nearly 2%;
- The disability pay gap indicates that disabled staff are more likely to be employed at higher grades compared with other staff. It should also be noted that although the pay gap is marginally in favour of disabled staff, there is still a lack of overall representation at all levels
- The most pronounced intersectional pay gap is gender and ethnicity which shows ethnically diverse men have a negative pay gap, and this is particularly the case amongst FRS staff;
- There are no significant disparities when comparing ethnically diverse and white disabled members of staff which is the same for disabled women and men; and,
- Control Staff numbers are relatively low when looking at intersections.

1.5 The gender pay gap analysis is based on a declaration rate of nearly 100% and the key findings are as follows:

- As at 31 March 2022 the LFB had a median gender pay gap of -5.46% and a mean gender pay gap of -7.42%; both have decreased since 2021;
- The mean and median gaps have decreased in the reporting period owing to the number of leavers as a result of the pension remedy. Additionally, promotions and pull through of women throughout the organisation has had an impact. The pay structure of the LFB means that pay gap figures fail to highlight a lack of representation in more senior roles;
- There is a small positive median pay gap for women for part and full time workers, and a positive mean pay gap for women (7.5%) for full time staff. For part time staff, there is a positive pay gap towards men (7.3%); and,
- The biggest LFB staff group of operational staff had a zero pay gap, but this has increased from 2020/21 owing to a trainee intake with a larger percentage of women.

## 2 Methodology

2.1 Equal pay measures whether men and women are paid the same for performing work of equal value. Upholding equal pay is a legal requirement and LFB have robust processes in place to ensure LFB pay our people fairly, including job evaluation and a standardised approach to job grading and reward.

2.2 The gender, ethnicity and disability pay gap is different. It measures the difference between the average pay for all men and women, different ethnics groups and people are disabled and those who are not across the Brigade, regardless of their role or seniority

2.3 This report is consistent with our overarching objective and commitment to lead on tackling inequalities and to develop a workforce reflective of London. For FRS and some Control posts, a job evaluation scheme evaluates the job and not the post holder, which creates trust and fairness. It makes no reference to any personal characteristics of existing or potential job holders.

2.4 It is also important to note that there are three staff groups with different terms and conditions; these have been broken down across each of the pay gap reports. The staff groups LFB refer to are:

- operational staff;
- Control staff; and,

- Fire and Rescue Services (FRS) staff.

- 2.5 It is important to note that there is no bonus scheme available to LFB employees.
- 2.6 The mean pay gap is the difference between the average hourly earnings of the two staff groups of interest, for example, the average pay for a woman against the average for a man.
- 2.7 The median pay gap is the difference between the midpoints in the ranges of hourly earnings of the two staff groups of interest. It takes all salaries in the sample, lines them up in order from lowest to highest, and picks the middle salary. The median is less affected by outliers than the mean. LFB reports on both median and mean data in this report, for all pay gaps.
- 2.8 The pay gap is calculated using the formula below, in accordance with government guidance:

$$\frac{A - B}{A} \times 100$$

where:

	Variable in pay gap formula	Mean/median hourly rate of pay of which group of staff?
Ethnicity pay gap	A	White staff
	B	Ethnically diverse staff Asian or Asian British staff Black or Black British staff Mixed ethnicities staff Other Ethnic Group staff
Disability pay gap	A	Non-disabled staff
	B	Disabled staff
Gender pay gap	A	Men
	B	Women

- 2.9 As a public sector body, the snapshot date for gender pay gap data collection is on 31 March each year. For consistency, the ethnicity and disability pay gap data will also use this date. This report is therefore based on our pay gaps as of 31 March 2022.
- 2.10 On 31 March 2022, LFB had 5,554 employees. The LFB comprise three distinct staff groups in the organisation including operational, FRS and control staff; volunteers and agency staff are excluded from the report. LFB collected staff data on ethnicity, disability and gender via self-declaration on our internal HR system. The number of staff members included in the pay gap reporting exercise were as follows:

Ethnicity Pay Gap	5418 (disclosure rate 97.6%)
Disability Pay Gap	5440 (disclosure rate 97.9%)
Gender Pay Gap	5554 (disclosure rate 100%)

- 2.11 LFB recognises that each ethnicity has its own unique identity and experience different barriers however, for reporting purposes LFB uses the term ‘ethnically diverse’ to reflect a number of ethnic groups. This includes all staff who have self-identified as Black, Asian, of mixed or multiple ethnicities, and of other ethnic groups. Staff can select their ethnic group from a more detailed list, and where possible and appropriate, LFB provides analysis of specific ethnicities.
- 2.12 As ‘disability status’ is simply self-declared, LFB does not currently ask for further details but under iTrent it will in the future be able to identify between physical and neurodiversity
- 2.13 The LFB collect data on our staff members’ sex and gender identity. The data used in previous gender pay gap reports have been for males and females (sex). Therefore, for consistency, this means that females are reported as women and males are reported as men. It is appreciated

that some colleagues may not see their sex and gender as the same nor identify within this gender binary. LFB welcomes and values colleagues of all gender identities. LFB welcomes and value colleagues of all gender identities. LFB recognises non-binary identities and continuously work with the LGBTQ+ Staff Equality Support group and others to review our HR policies and communications to ensure gender-neutral language is used throughout.

2.14 With effect from 1 April 2018, the individual holding the office of London Fire Commissioner is appointed by the Mayor of London and is not considered an employee of the LFB for the purpose of pay reporting. However, in the interests of transparency, the Commissioner's pay has been included for the purposes of this report.

### 3. Ethnicity pay gap

3.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

3.2 In this report, LFB compare the overall ethnicity pay gap between ethnically diverse staff and White staff, taken as a whole. There is further analysis by separate groups (Asian or Asian British, Black or Black British, Mixed ethnicities and Other Ethnic Groups) where numbers allow. The White group includes White British, White Irish and White Other.

3.3 On 31 March 2022, our overall median ethnicity pay gap was 0.8% and our mean ethnicity pay gap 4.52%.

3.4 This indicates that the average hourly rate of pay for ethnically diverse staff is less than the average hourly rate of pay for White staff and represents very little change year on year. Whilst the pay gap figures are close to parity, the bigger area of concern stems from the lived experience of staff, as outlined in the cultural review and the lack of ethnically diverse staff at senior levels of the organisation

3.5 The overall national and London pay gaps usually come from the Annual Population Survey (APS). However, major disruption to how this survey is normally carried out, means it has been difficult to get robust estimates from it. For context, it was last conducted in 2019 and showed the median ethnicity pay gap for all workers nationally (UK) was 1.6%, and rose to 28.2% in London. London's ethnicity pay gap is far higher than nationally partly because it has a much larger proportion of BAME employees among its workforce than the rest of the country and wages also tend to be higher than elsewhere. Mean ethnicity pay gaps were not presented as they are not robust enough.

3.6 Our median ethnicity pay gap is smaller than the average across London in 2019.

3.7 Figures 3 and 4 show the median and mean pay gaps respectively for the separate ethnic minority groups at the GLA .

Figure 3:

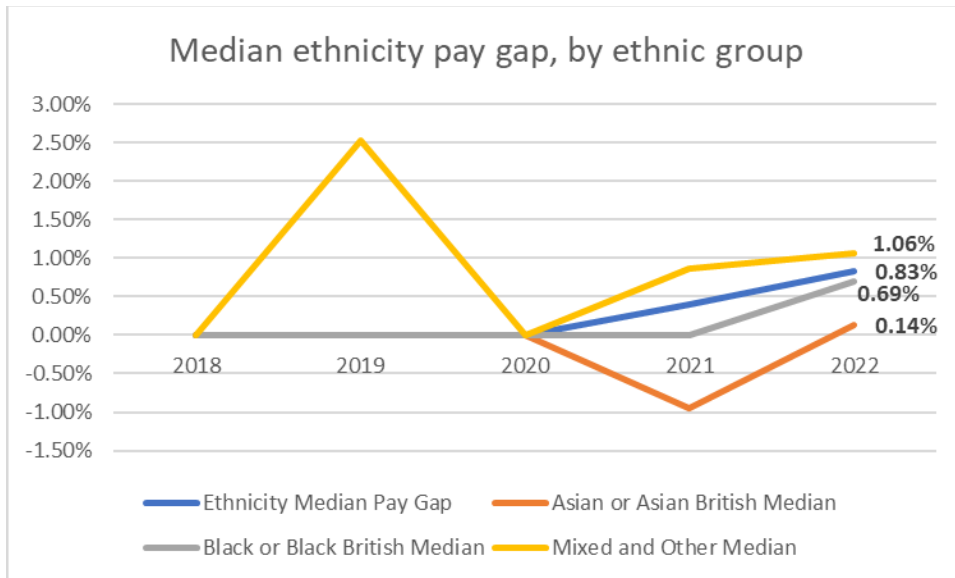
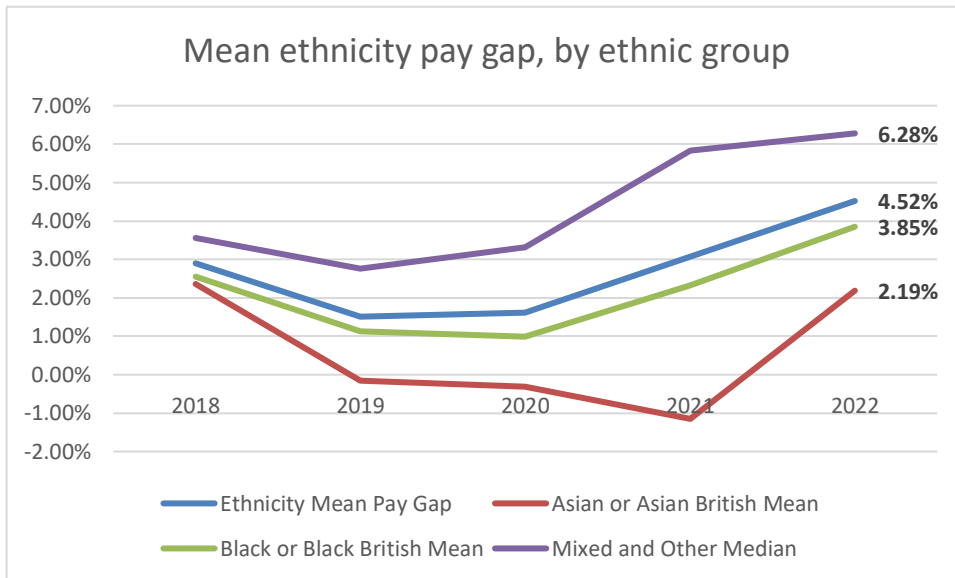


Figure 4:



- 3.8 The highest ethnicity pay gap is among Mixed and Other staff. The smallest ethnicity pay gap is among Asian or Asian British staff. This group has a median pay gap of 0.14% which has increased since 2018, as well as in the last year. Even though the pay gap changes have overall been minimal, all ethnic groups' pay gaps have increased since 2018.
- 3.9 The number of ethnically diverse staff at the LFB has grown since 2018 (15.6% of staff in March 2018, 17.2% of staff in March 2022), though has not grown in the last year (see Figure 14).

Figure 14:

	2018	2019	2020	2021	2022
Ethnically Diverse	863	891	926	963	964
White	4600	4766	4781	4733	4502
Not Known	72	82	76	109	107
Prefer not to say	0	0	2	16	27
Total	5535	5739	5785	5821	5600
% Ethnically Diverse	15.6%	15.5%	16.0%	16.5%	17.2%

Note: The table numbers show how many staff shared information for ethnicity pay gap reporting purposes and may differ from the total number of LFB staff.

3.10 In 2022, LFB employed 964 ethnically diverse staff across all 3 staff groups. There were 128 Asian or Asian British staff, 124 Black or Black British staff, 52 staff with a Mixed ethnicity and 22 with an Other Ethnic Group.

3.11 For the purposes of ethnicity pay gap reporting, LFB examined the distribution of salaries of ethnically diverse and white staff in £10k increments up to £100k, with those earning more than £100k in one group.

3.12 Figure 15 highlights clearly that our higher salary jobs are more likely to be held by White employees than ethnically employees who are under-represented in senior levels of the Brigade.

Figure 15: Proportion of jobs within pay band that are staffed by ethnically diverse employees in each of the staff groups.

All Staff			
Salary	Any Other Ethnic Group	White	Total
<=£20,000			
£20,001 to £30,000	26	74	100
£30,001 to £40,000	223	2149	2372
£40,001 to £50,000	113	1819	1932
£50,001 to £60,000	8	131	139
£60,001 to £70,000	11	169	180
£70,001 to £80,000	3	66	69
£80,001 to £90,000	1	26	27
£90,001 to £100,000		4	4
£100,001 >		18	18

Operational Staff			
Salary	Any Other Ethnic Group	White	Total
<=£20,000			
£20,001 to £30,000	14	38	52
£30,001 to £40,000	184	1883	2067
£40,001 to £50,000	95	1585	1680
£50,001 to £60,000	3	55	58
£60,001 to £70,000	7	109	116
£70,001 to £80,000	2	44	46
£80,001 to £90,000		12	12
£90,001 to £100,000		2	2
£100,001 >		9	9

FRS Staff			
Salary	Any Other Ethnic Group	White	Total
<=£20,000			
£20,001 to £30,000	10	34	44
£30,001 to £40,000	36	247	283
£40,001 to £50,000	15	187	202
£50,001 to £60,000	2	57	59
£60,001 to £70,000	4	56	60
£70,001 to £80,000	1	22	23
£80,001 to £90,000	1	11	12
£90,001 to £100,000		2	2



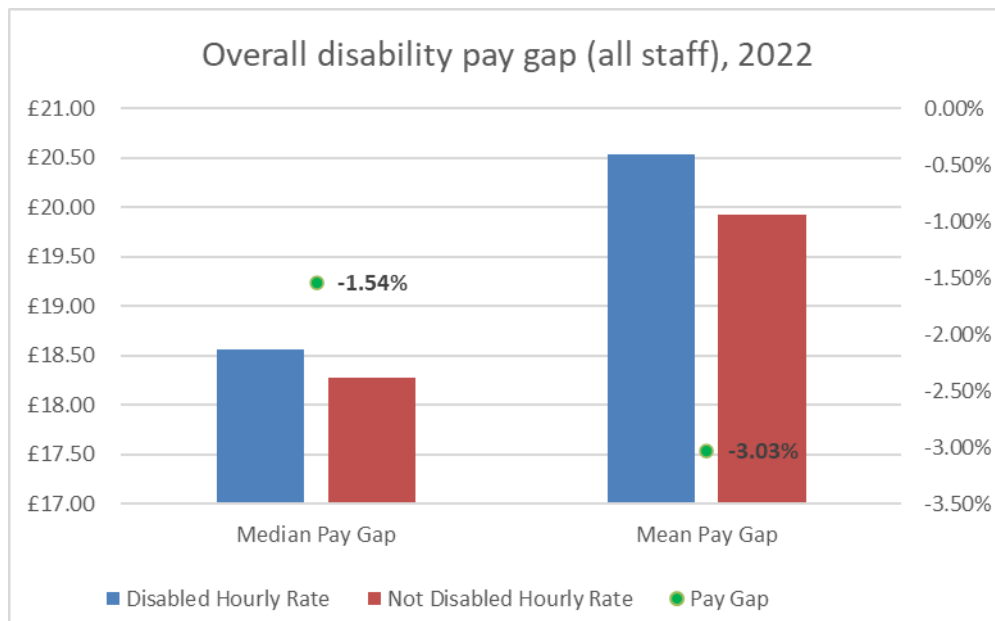
£100,001 >		9	9
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Control Staff			
Salary	Any Other Ethnic Group	White	Total
<=£20,000			
£20,001 to £30,000	2	2	4
£30,001 to £40,000	3	19	22
£40,001 to £50,000	3	47	50
£50,001 to £60,000	3	19	22
£60,001 to £70,000		4	4
£70,001 to £80,000			
£80,001 to £90,000		3	3
£90,001 to £100,000			
£100,001 >			

#### 4. Disability pay gap

4.1 As at 31 March 2022, LFB had a median disability pay gap of -1.54% and a mean disability pay gap of -3.03% (see Figure 17).

Figure 17:



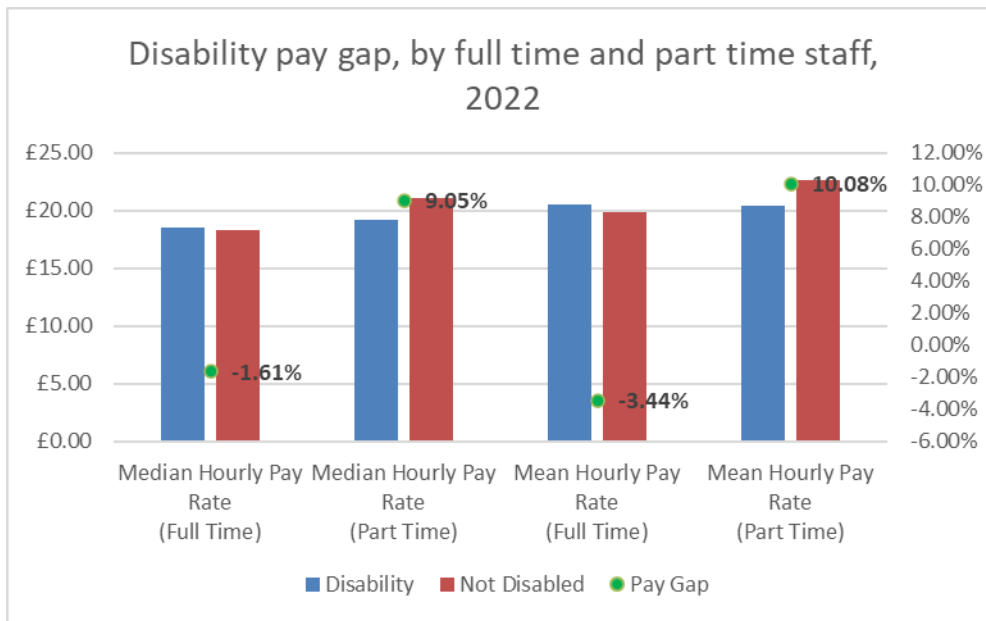
4.2 This indicates that our disabled staff marginally receive an average hourly rate of pay higher than the average hourly rate of pay for non-disabled staff. The gaps are larger than the gender pay gaps, but not as large as the ethnicity pay gaps.

4.3 As with ethnicity pay gap data, the overall national and London disability pay gaps usually come from the APS. The same issues apply here about the data for the last few years being less robust, as with the ethnicity pay gap data. This means that no figures for 2020 are shown in this report. However, LFB directs readers to previous years' data when data collection on the APS was done as normal.

4.4 In 2019, the final year of uninterrupted survey fieldwork on the APS, the national (UK) median disability pay gap for all workers was 14.8%. The median disability pay gap for workers in London in 2019 was 16.6%. Mean disability pay gaps are not presented as they are not robust enough. Our median disability pay gap is smaller than the London average in 2019.

4.5 For full time workers, the median disability pay gap is minimal at 1.61% while the mean disability pay gap is 3.44%. There is a more pronounced disability pay gap for part time workers: 9.05% is the median pay gap while the mean pay gap is 10.08% (see Figure 18).

Figure 18:



4.6 The pay gap for part time workers can be explained by the fact that there are disproportionately few part-time disabled workers at the LFB at higher ranks and grades.

4.7 A median disability pay gap is marginal for all earnings quartiles, with the largest difference being the median upper middle quartile at 1.4%. Figures 19 and 20 illustrate this.

Figure 19

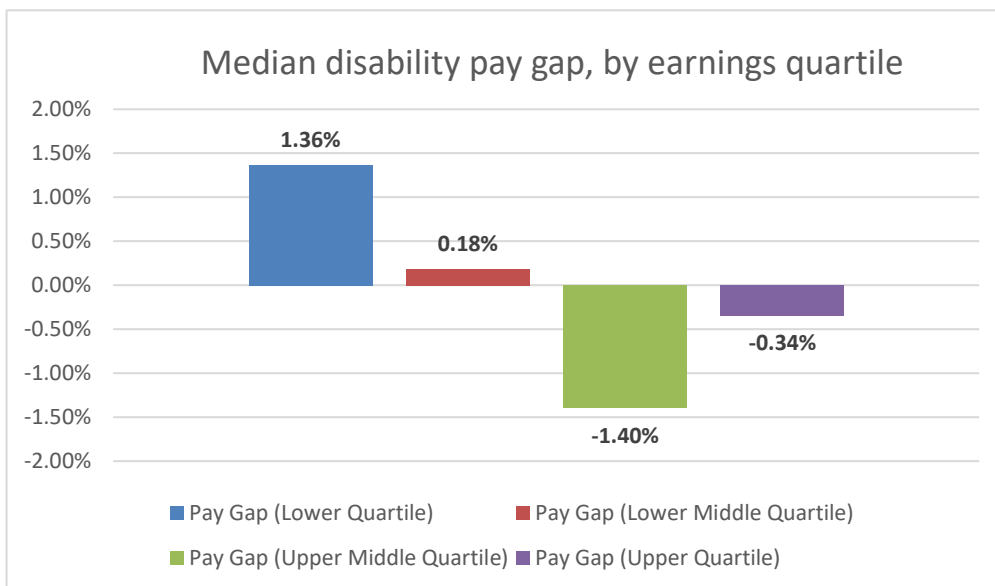
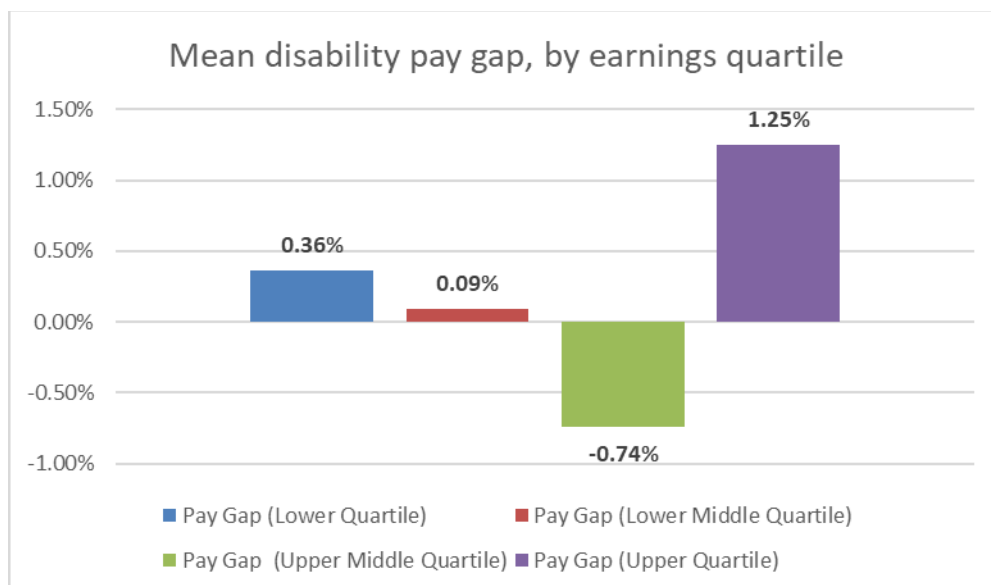


Figure 20



4.8 LFB has a good disclosure rate (97.9%) from staff who have shared that they are disabled (see Figure 22).

Figure 22:

	2022
Disabled	442
Not Disabled	4998
Total that share disability information	5440
LFB staff eligible for pay gap analysis	5554
Disclosure rate	97.9%

4.9 For disability pay gap reporting purposes, LFB examines two aspects of pay in particular:

- Distribution of salaries of disabled and non-disabled staff in £10k increments up to £100k, with no-one earning more than £100k in one group.
- Distribution of salaries of disabled and non-disabled staff in equally sized salary groupings, not related to our pay and grading structure.

Figure 23 shows that our disabled staff are fairly well distributed throughout the pay bands with a largest percentage in the £90,000 to £99,000 grouping. The pattern demonstrates that our higher salary jobs are more likely to be staffed by disabled employees than non-disabled employees. The GLA workforce report dated July 2021 shows that 12% of London's working-age population is disabled. Therefore, disabled staff are well represented in most pay bands .

Figure 23: Proportion of jobs within pay band that are staffed by disabled employees

Pay band	2022
<=£20,000	N/A
£20,001 to £30,000	8.3%
£30,001 to £40,000	7.8%
£40,001 to £50,000	7.9%
£50,001 to £60,000	12.8%
£60,001 to £70,000	8.5%
£70,001 to £80,000	14.1%
£80,001 to £90,000	6.9%
£90,001 to £100,000	25.0%
£100,001 >	5.3%

4.10 Eight per cent of our staff who are paid between £20,000 and £29,999 are disabled. In contrast, the proportion of our staff paid over £100,000 who are disabled is 5.3%. The £90,000 to £99,999 pay band shows that 25% of staff are disabled (above the 12% of working-age Londoners who are disabled). However, this is an outlier due to the very low number of staff in this pay band overall (one staff change can lead to a big percentage change).

## 5. Gender pay gap

5.1 As of 31 March 2022, LFB had a median gender pay gap of -5.46% and a mean gender pay gap of -7.42% (see Figures 25 and 26).

Figure 25:

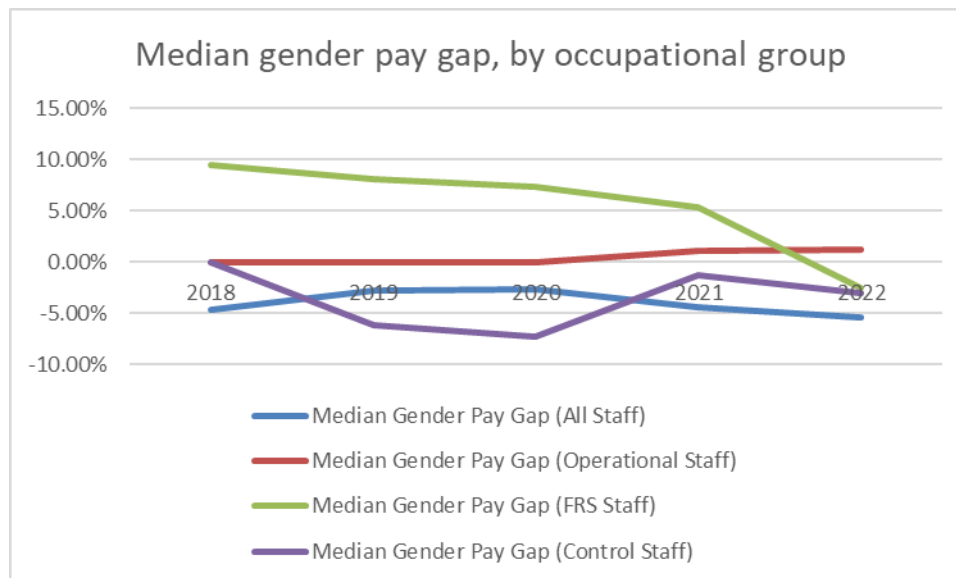
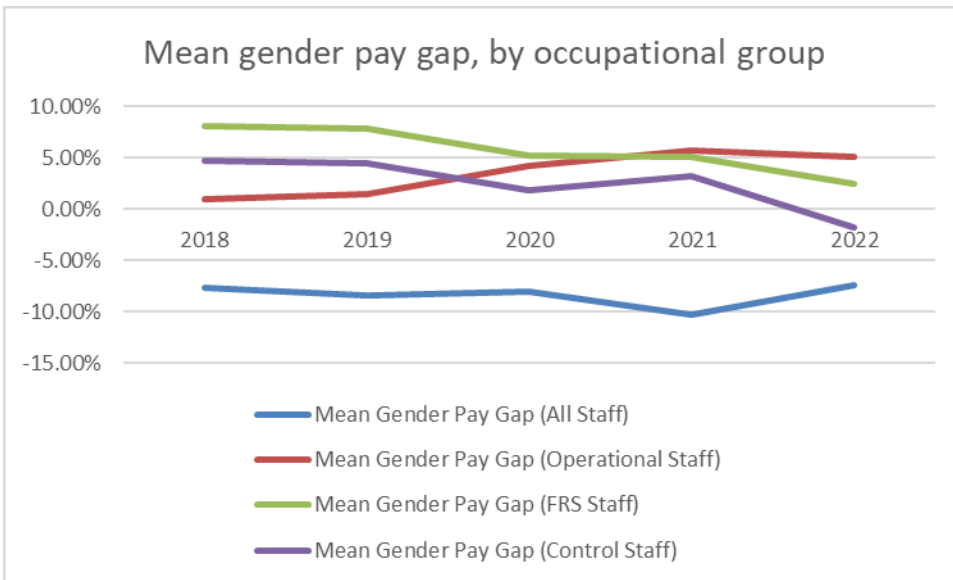
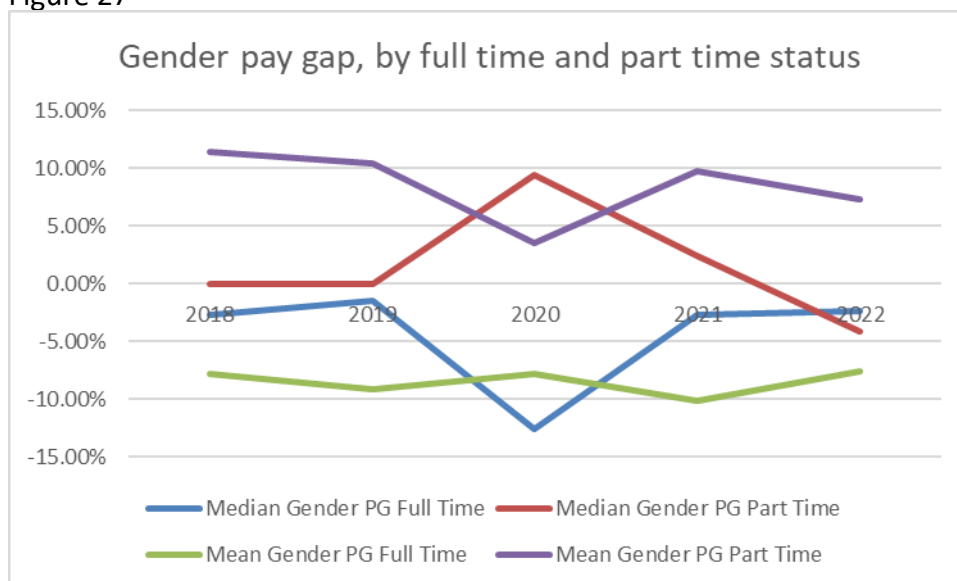


Figure 26:



- 5.2 This shows that the average hourly rate of pay for women is still slightly higher than the average hourly rate of pay for men. However, the gaps are around the same since 2018 and slightly less than the last year.
- 5.3 The mean and median gaps have fallen in the last year. A contributing factor to this is a higher number of male staff who have retired due to changes to the LFB pension policy. This has impacted the proportion of men and women working at higher grades and ranks. The largest staff group (operational) who have the largest proportion of male staff skews the data and creates a false impression of a positive pay gap.
- 5.4 Our pay gaps compare favourably to both the national (UK) and London picture . The national median gender pay gap for all workers in 2021 was 15.4% and the mean gender pay gap was 14.9% . The median gender pay gap for workers in London in 2021 was 16.2% and the mean gender pay gap was 21.1%.
- 5.5 For full time workers, the median pay gap is -2.34% while the mean pay gap is -7.55%. The pay gaps for part time workers is -4.10% is the median pay gap while the mean pay gap is 7.32% (see Figure 27).

Figure 27



The pay gaps for full time staff are all broadly similar to what they were in 2018 despite peaks in 2020 over Covid.

- 5.6 A negative gender pay gap exists for the upper quartile (median pay gap of -7.74% and mean

pay gap of -5.01%). There is a gender pay gap for the lower quartile (median pay gap of 4.82% and mean pay gap of 4.05%). Figures 28 and 29 show these.

Figure 28

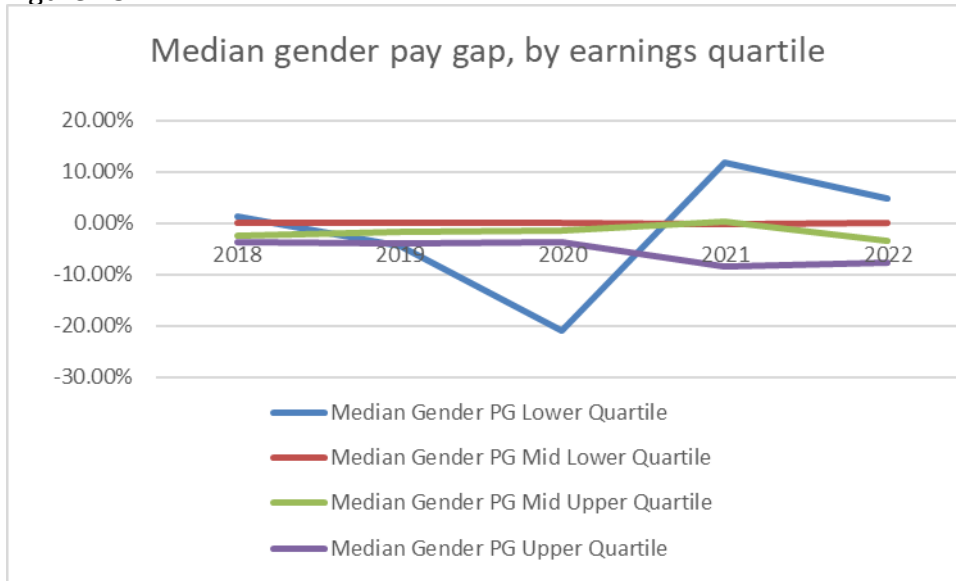
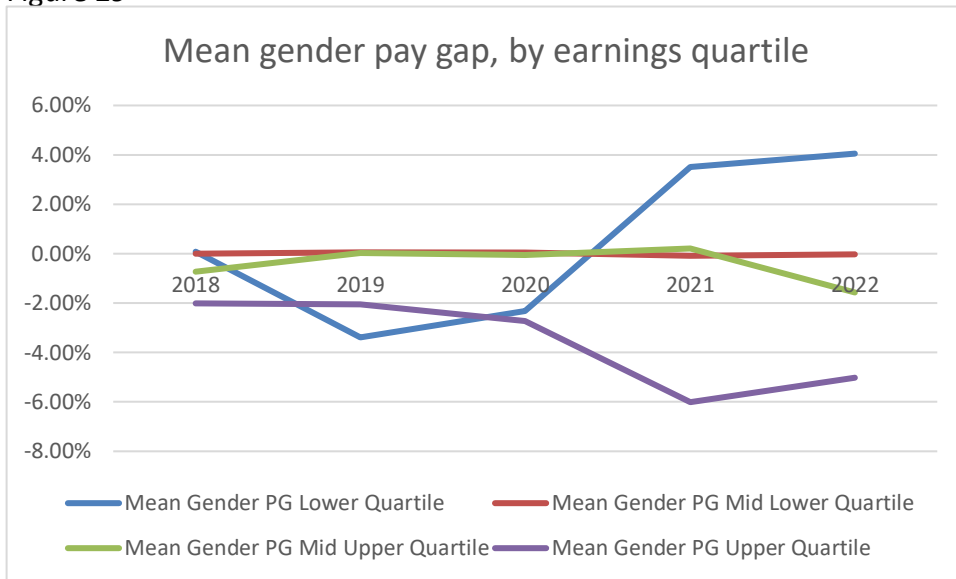


Figure 29



- 5.7 There is a near-zero pay gap for staff in the middle quartiles. The gender pay gap for staff in the upper quartile has moved from near zero in 2018 and overall increased in the last year.
- 5.8 The proportion of female staff has grown every year since 2018 to 2022 with a levelling off in the last two years owing to recruitment freeze over COVID (see Figure 34).

Figure 34

	2018	2019	2020	2021	2022
Women	806	851	914	982	989
Men	4729	4888	4855	4839	4611
Total LFB Staff	5535	5739	5769	5821	5600
% Women	14.56%	14.83%	15.84%	16.87%	17.66%

*Note: The numbers in the table are the number of staff that shared information for gender pay gap reporting purposes. This may differ from the total number of staff.*

5.9 For the purposes of gender pay gap reporting, LFB examined two aspects of pay in particular:

- Distribution of salaries of female and male staff in £10k increments up to £100k. Those earning more than £100k are in one group.
- Distribution of female staff in the lowest and highest earning roles.

5.10 Figure 35 shows a clear pattern that our higher salary jobs are more likely to be staffed by men than women and in 2022, there has been a significant increase in women into our lowest salary range through an increase in joiners, predominantly through Outreach work.

Figure 35: Proportion of jobs within pay band that are staffed by female employees

	2018	2019	2020	2021	2022
< £20,000	0.00%	83.33%	N/A	N/A	N/A
£20,000 - £29,999	29.98%	21.38%	20.85%	26.50%	44.37%
£30,000 - £39,999	11.47%	12.93%	13.95%	14.76%	17.24%
£40,000 - £49,999	16.37%	13.35%	13.80%	14.83%	14.26%
£50,000 - £59,999	18.00%	21.67%	28.26%	32.12%	34.44%
£60,000 - £69,999	23.88%	18.10%	20.00%	20.71%	23.98%
£70,000 - £79,999	33.33%	26.32%	25.58%	22.37%	24.05%
£80,000 - £89,999	20.00%	17.39%	14.29%	25.81%	24.14%
£90,000 - £100,000	0.00%	0.00%	0.00%	23.08%	0.00%
£100,001 >	20.00%	23.53%	26.67%	30.43%	28.57%

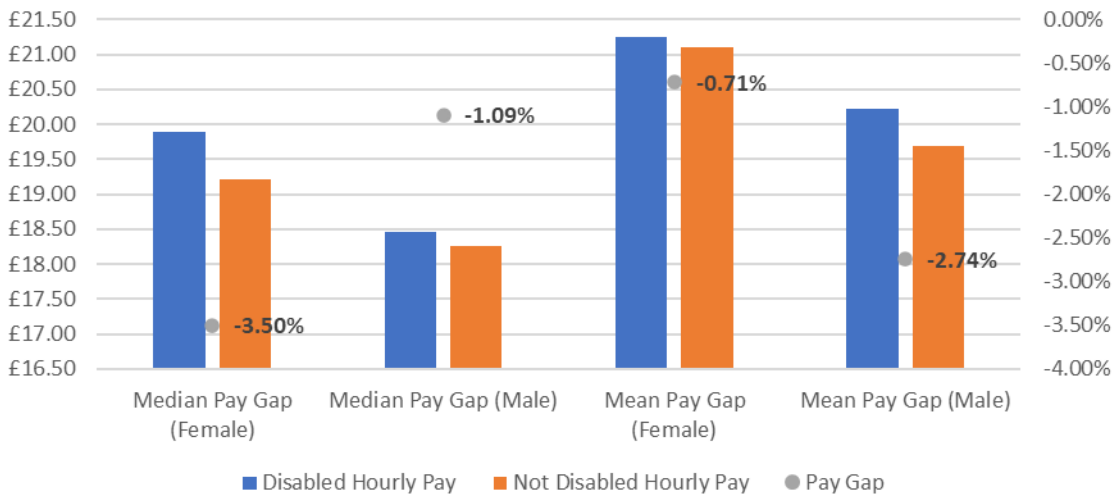
5.11 Forty-four per cent of staff who are paid between £20,000 and £29,999 are female. In contrast, the proportion of staff paid over £90,000 who are female is 28.5%. This is an improvement on the figures from 2018 of 8.57%.

## 6. Conclusion

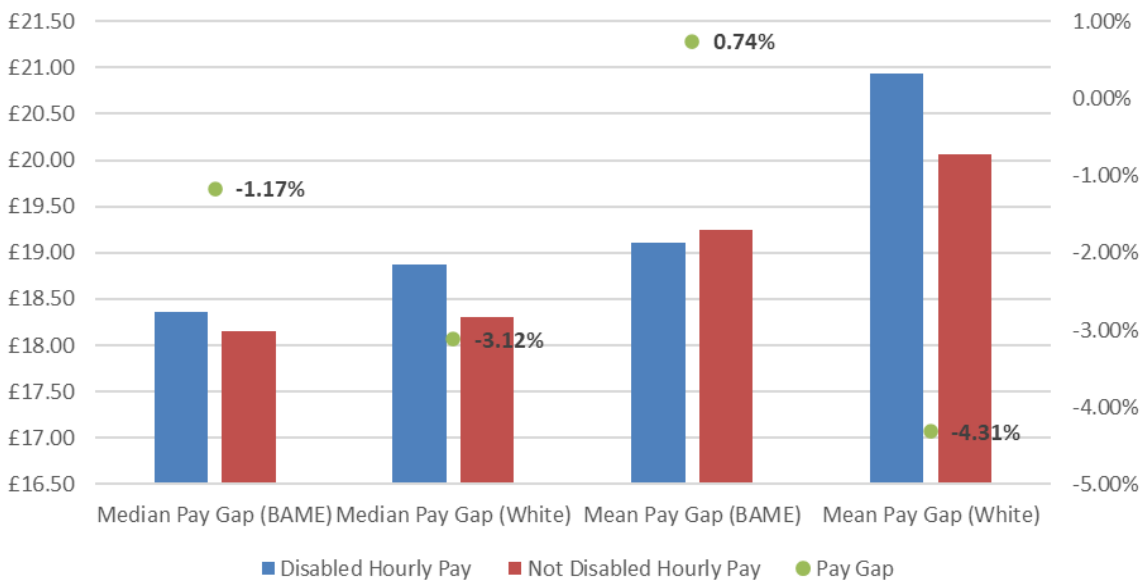
6.1 LFB used an intersectional approach in this report which shows that overlaps in an individual's identity can sometimes create compounding experiences of disadvantage. The tables below show the mean and medium pay gaps by:

- Gender and ethnicity
- Ethnicity and disability
- Gender and disability

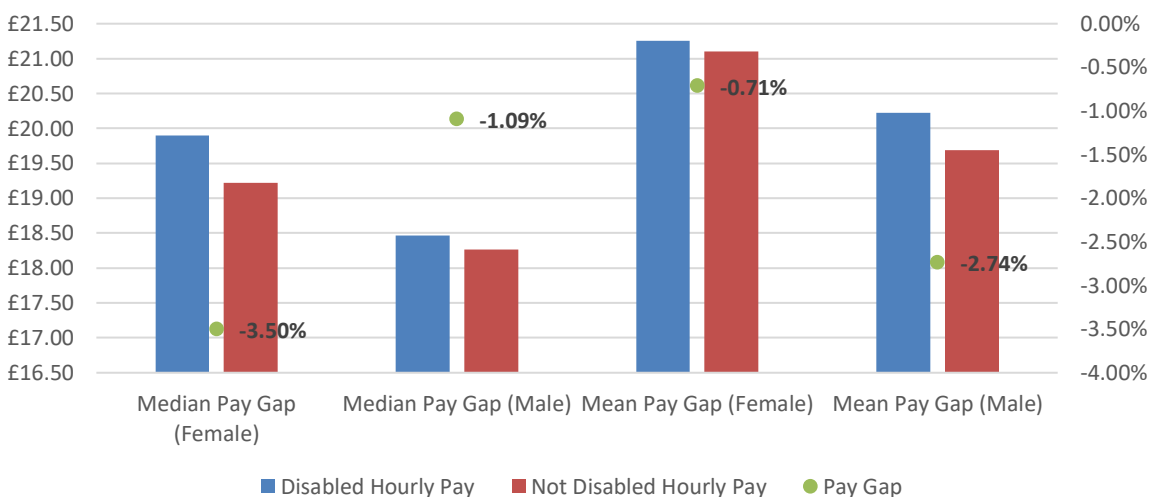
All Staff: Disability Pay Gap by Gender, 2021/22



All Staff: Disability Pay Gap by Ethnicity, 2021/22



All Staff: Disability Pay Gap by Gender, 2021/22





- 6.2 Whilst our pay gap relating to ethnicity is marginal, it is clear our top earners and senior levels of the organisation are lacking ethnically diverse staff. It takes time for the diversity in our largest staff groups to pull through and the figures are distorted by our largest staff group, operational staff. The average hourly rate of pay for ethnically diverse staff is still less than that of White staff, and both the mean and median gaps have increased slightly since last year. Additionally, it is worth noting that the staff experience and the evidence collated via our culture review gives a picture of a culture where our ethnically diverse staff do not flourish and are hampered by institutional racism; this will no doubt impact the pay gap report in terms of promotions, retention and development. The most pronounced pay gap is amongst Asian or Asian British (+10.09%) staff versus White staff due to lack of representation at higher ranks / grades.
- 6.3 In intersectional terms, the most pronounced pay gap is Gender and Ethnicity which shows men from ethnically diverse background receive less pay, and this is particularly the case amongst FRS staff.
- 6.4 This is the second year LFB has reported its disability pay gaps. A new data collection system, iTrent, being introduced in early 2023 will allow for us to better interrogate our data in disability. Whilst the pay gap is close to parity / slightly in favour of disabled staff it does not reflect the lack of representation at the senior levels of the organisation. As at 31 March 2022, LFB had a median disability pay gap of -1.54% and a mean disability pay gap of -3.03%.
- 6.5 Some 97.9% of our staff shared disability information which is promising. However, there are still some noticeable patterns. The mean disability pay gap is most extreme in part time staff. Further intersectional analysis reveals that there are no significant disparities when comparing ethnically diverse disabled and white disabled staff, and the same for gender.
- 6.6 LFB still has what appears to be a positive pay gap towards women, including those declaring as having a disability as has previously been outlined in pay gap reports for gender. This is owing to the largest staff group (operations) and lowest pay scales having a low number of women; LFB is starting to see increases in diversity across all ranks. The flat salary can mask disparities when using pay gap metrics. Women staff continue to receive a slightly higher average hourly rate of pay compared to men but this does not reflect the staff experience, nor the difficulties experienced by women. Soft evidence from leavers interviews in more senior roles and positions attests to this.
- 6.7 The mean and median gaps have decreased since 2018 because of a narrowing in the proportion of men and women at higher grades. However, men are still more likely to be in these roles at the most senior levels of the organisation and although there is an observable improvement, particularly in the more middle bands, change is not as quick as liked. In fact, for part time staff the mean and median gender pay gaps have increased. The mean and median gender pay gaps exist only for staff in the upper quartile of earnings at the LFB.

## 7. Equality Comments

- 7.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 7.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 7.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have

due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.

7.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:

- eliminate discrimination, harassment and victimisation and other prohibited conduct.
- advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- foster good relations between people who share a relevant protected characteristic and persons who do not share it.

7.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

7.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

7.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- tackle prejudice
- promote understanding.

7.8 At Appendix 1, you can find our Pay Gap Action Plan for Ethnicity, Disability and Gender. This action plan comprises work that will address the pay gaps but most importantly, the culture within the LFB, taking into account recommendations from the HMI report and the recommendations from the Jaden Francois-Esprit inquiry. The LFB will continue to monitor our progress against the action plans and provide annual updates accordingly. Our pay gap report and action plan supports delivery against the Mayor's vision of a fair and equal city and corresponding Diversity and Inclusion Action Standard.

## 4 Other considerations

### Workforce comments

4.1 The report author should consider any workforce issues which may/will arise as a consequence of the implementation of the report's recommendations. For example, resource implications or consultation with representative bodies.

### Sustainability comments

4.2 The report does not contain any issues that would need to be considered by the Sustainable Development team.

## Procurement comments

4.3 The report does not contain any business cases so there are no procurement implications.

## Communications comments

4.4 The report does not recommend any policy be created or amended. All activities and workstreams commented upon have individual leads who should be liaising with the communications teams to develop appropriate engagement plans.

## Financial comments

4.5 The report does not commit the organization to any new activity and simply comments existing workstreams that have already been agreed.

## Legal comments

4.6 The report refers to a combined Ethnicity, Disability and Gender pay report. The report, with Appendix 1, is presented for information only. Therefore, no direct legal implications arise.

Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. The London Fire Commissioner must secure that the London Fire and Rescue Service is efficient and effective. The London Fire and Rescue Service means the personnel, services and equipment secured by the London Fire Commissioner for the purposes of the carrying out the Commissioners functions. The Mayor must hold the London Fire Commissioner to account for the exercise of the Commissioner's functions.

The London Fire Commissioner ('LFC') is a 'relevant public authority' for the purposes of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 (schedule 2 to the Regulations). Regulation 3 and Schedule 1 of the 2017 Regulations set out the obligations on public authorities to publish certain information such as gender pay gap relating to employees.

There is no statutory obligation to publish ethnicity or disability pay gap information, but this is good practice, particularly in demonstrating how the LFC meets the Public Sector Equality Duty to advance equality of opportunity. The LFC may collate and publish this information towards that end under the general powers contained in section 5A Fire and Rescue Services Act 2004 (FRSA 2004) which empowers the LFC to do anything it considers appropriate for the purposes of the carrying out of any of its functions., or anything incidental or indirectly to its functional purposes through a number of removes .

Transparency and openness of reporting builds confidence, and also ensures the Brigade seeks continuous improvement in its employment practices. This report demonstrates the Commissioners compliance under the Public Sector Equality duty, and the commitment to continually review the Brigades recruitment processes addressing areas through an action plan outlined in the report.

# List of appendices

Appendix	Title	Open or confidential*
1	[LFB Pay gap action plan for ethnicity, disability and gender	Open

## Appendix 1

### LFB Action plan for ethnicity, disability and gender

#### Introduction

The action plan seeks to address systemic issues which will result in an improvement in LFB’s pay gap position. Divided into three areas, action also seeks to respond to various other reports including the Culture Review and HMICFRS report (2022). As the Brigade’s maturity in relation to ethnicity, gender and disability improves, the quality of our actions will also improve. The three areas are: improving LFB policies, systems and processes, improving LFB’s culture, leadership and behaviours and improving the organisation’s approach to recruitment and promotions.

#### Improving our policies, systems and processes

- People Partners are now working with their respective Heads of Service to **review diversity data at all levels of the department**. This new approach will allow LFB to identify opportunities for diversification of talent within different business units and work with hiring managers to attract and retain diverse talent at senior levels of the organisation to tackle the pay gap across all areas.
- LFB has agreed to **expand equality-based performance measures** as part of the Community Risk Management Plan (CRMP) to include staff composition (number of staff who are women, number of staff who are from an ethnicity programme, number of staff with disabilities and the number of staff who are Lesbian, Gay or Bisexual). The targets will be confirmed as part of the governance process for the CRMP.
- In order to address some of the systemic issues in pay disparity, LFB is in the process of procuring an external agency to **conduct a full review of FRS pay**. This will have the specific aim of reducing pay gaps across the three areas. In addition to the review of pay, the Brigade will also commission a review of reward for all staff (i.e. non-salary).
- LFB is also committed to **reviewing pay for Top Management Group (TMG)** staff members.

#### Improving our culture, leadership and behaviours

- In order to better equip staff at all levels to understand the value of recruiting and promoting diverse talent LFB is **improving its leadership development programmes**, which all have equality, diversity and inclusion content embedded within.

- Top Management Group (TMG) leaders and subject matter experts from People Services are taking part in **inclusive leadership training** that is targeted to make sure they fully understand the issues outlined in the Independent Culture Review and can understand the nature of systemic and institutional discrimination. As these leaders of people and systems begin to lead change in these areas, they will be better informed and able to deliver intended outcomes in relation to pay. This also includes using positive action to offer leadership development opportunities for staff from underrepresented groups to attend programmes for more senior grades.
- Offering opportunities for **staff to have a coach and mentor** as part of the Leadership Academy's coaching and mentoring service, this will be targeted to staff from underrepresented groups at mid to senior levels of the Brigade.
- A new Organisational Learning Model (OLM) will be published which will clearly **outline the skills and capabilities required for all posts** at all levels of the organisation. This will allow staff to identify more accurately the learning and development required to apply for different jobs – improving fairness and transparency will help improve diversity at all levels.
- **All staff will have a mandatory inclusion objective**; previously this was optional, but for the new performance year commencing in April '23, this will become mandatory. People Partners will work with Heads of Service to moderate objectives which could include diversifying teams, improving training and development for staff from underrepresented groups and other activities which will help improve the pay gap position.

### Improving our approach to recruitment and promotions

LFB's outreach team is committed to bringing diverse talent into the organisation and this activity has directly positively impacted our attraction of diverse talent, as well as managing expectations and supporting diverse communities who do go through our recruitment processes. Activities include:

- **Developing a 'keeping warm plan' to reassure, engage with and value diverse talent** currently not in the pipeline but waiting to progress their applications when recruitment opens. Those from under-represented groups may be feeling discouraged from joining the service (for a mixture of reasons including time between applications and start date, some of the media coverage of the LFB etc) and the Brigade needs to support them with making the decision right for them, once they are armed with the information around the actions being taken to protect staff.
- **Rolling out a programme of "Experience sessions"** across London for potentially interested candidates to help expose them to the realities of the job, the working environment and people they may be working with at station. These will be held at fire stations across London.
- There will be a **targeted communications campaign in 2023 aimed at women to encourage applications** from this under-represented group.
- The outreach team will invite women, those from an ethnic background and neurodiverse potential applications to an 'Inspiring success workshop' online, where the Outreach Team provide them with **advice around preparing for the application assessments, fitness tests and addressing misconceptions about the role.**
- A campaign to inform staff about **the reason for, and benefits of, positive action** following a specific action in the latest HMICFRS report. It is intended to shift the perception around recruiting diverse talent from threat to reward.

The Culture Review also had specific recommendations (which were all accepted) which will improve the pay gap position. They were to:

- Improve **the fairness and transparency of senior selection panels by appointing independent chairs and panel members** and asking all candidates and panel members to declare any interests, including membership of the Freemasons;
- **Recruit and progress firefighters who reflect and can demonstrate their commitment to London's diverse communities;** and,
- Create an LFB workforce planning strategy to support the 'Togetherness Strategy', using data to link practices to long-term goals and outcomes. **This will understand the reasons why BAME staff and women are significantly underrepresented in the organisation in comparison to their White, male counterparts, and design interventions to improve this ratio.** It will also deliver positive action to ensure talent at all levels is identified and, where appropriate, fast track development programmes enable people to fulfil their talent, particularly underrepresented groups.

These actions were accepted in November 2022 and initial scoping work on these activities is happening in early 2023.

## Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: **NO**

## Originating officer declaration

Reporting officer to confirm the following by using 'x' in the box:

### Reporting officer

Tiffany Oarton has drafted this report and confirms the following:

1. Assistant Director/Head of Service  
[Name] has reviewed the documentation and is satisfied for it to be referred to Board for consideration

2. Advice  
The Finance and Legal teams have commented on this proposal:  
[Name] Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer).  
[Name] Financial Advisor, on behalf of the Chief Finance Officer.